## UNITED STATES DISTRICT COURT

## DISTRICT OF NEW JERSEY

: HON. TONIANNE J. BONGIOVANNI, U.S.M.J.

UNITED STATES OF AMERICA CRIMINAL NO.: 14-5064

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Plaintiff, Criminal Action

NOTICE OF MOTION

THEODORE SANTAGUIDA : TO AMEND CONDITIONS OF

: RELEASE

Defendant :

TO: Molly S. Lorber, AUSA
United States Attorney's Office
District of New Jersey
402 E. State Street
Trenton, New Jersey 08608

VS.

## MADAM:

PLEASE TAKE NOTICE that on June 1, 2015 at 10:00 a.m., defendant, Theodore Santaguida, through his attorney, Scott A. Krasny, Esquire, Furlong and Krasny, shall move before the Honorable Tonianne J. Bongiovanni, U.S.M.J., at the United States District Court for the District of New Jersey, United States Court House, Trenton, New Jersey, for an Order amending Conditions of Pretrial Release.

In support of this motion, defendant shall rely upon the Certification of Defendant and oral argument if requested by the Court. A proposed form of Order has been submitted.

This motion has been filed by May 8, 2015.

I certify that the foregoing motion and supporting brief have been served upon the Clerk of the United States District Court, Post Office and Court House Building, Trenton, New Jersey 08625; Molly S. Lorber, AUSA, United States Attorney's Office, 402 E. State Street, Trenton, New Jersey 07102; all by electronic filing through the CM/ECF system.

Respectfully submitted,

By:

SCOTT A. KRASNY

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